

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIO EPELBAUM, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

DYNAGAS LNG PARTNERS LP, DYNAGAS
GP, LLC, DYNAGAS HOLDING LTD., TONY
LAURITZEN, MICHAEL GREGOS and
GEORGE J. PROKOPIOU,

Defendants.

Civil Action No.: 1:19-cv-04512

Hon. Alison J. Nathan

**MOTION OF FIRST NEW YORK GROUP FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

Plaintiff Mario Epelbaum, FNY Partners Fund LP and Scott Dunlop (collectively, the “First New York Group”) respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order: (1) appointing the First New York Group as Lead Plaintiff in the above-captioned securities class action (“Action”); (2) approving the First New York Group’s selection of Entwistle & Cappucci LLP (“Entwistle & Cappucci”) to serve as Lead Counsel for the Class; (3) consolidating for all purposes any subsequently filed, removed or transferred actions that are related to the claims asserted in the above-captioned Action, pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; and (4) for any such further relief as the Court may deem just and proper.

This Motion is made on the grounds that the First New York Group believes it is the “most adequate plaintiff” under the PSLRA and should, therefore, be appointed Lead Plaintiff. Specifically, the First New York Group believes it has the “largest financial interest” in the relief sought by the Class in this Action by virtue of, among other things, the substantial losses it suffered on its investments in Dynagas securities. The First New York Group also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other Class members’ claims and because it will fairly and adequately represent the interests of the Class. Moreover, the First New York Group is a paradigmatic Lead Plaintiff under the PSLRA because it is comprised of both a sophisticated institutional investor and two experienced individual investors with a substantial financial stake in the litigation. This group will guarantee the effective monitoring and supervision of counsel.

The First New York Group respectfully requests oral argument.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Andrew J. Entwistle and exhibits annexed thereto, the Joint Declaration of Mario Epelbaum, FNY Partners Fund LP and Scott Dunlop, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, the First New York Group respectfully requests that the Court: (1) appoint the First New York Group as Lead Plaintiff in the above-captioned Action pursuant to the PSLRA; (2) approve the First New York Group's selection of Entwistle & Cappucci to serve as Lead Counsel for the Class; and (3) consolidate for all purposes any subsequently filed, removed or transferred actions that are related to the claims asserted in the above-captioned Action pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; and (4) grant any such further relief as the Court may deem just and proper.

DATED: July 16, 2019

Respectfully submitted,

/s/ Andrew J. Entwistle

Andrew J. Entwistle

Robert N. Cappucci

Brendan J. Brodeur

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*Counsel for Plaintiff Mario Epelbaum, FNY
Partners Fund LP and Scott Dunlop and
Proposed Lead Counsel for the Class*